

providing a videocommunicator having a video signal input port, [a video signal encoding circuit and] a video signal output port, and a video signal encoding circuit with a programmable DSP circuit adapted to compress video data and with a programmable general purpose processor circuit;

Q4 using a digital still camera to generate video input signals to the video input port of the videocommunicator, the video output port of the videocommunicator capable of communicatively coupling to a communications channel for providing videoconferencing; and

using the videocommunicator for controllably altering a display, including at least one of pan, tilt and zoom functions, of the video input signals without controlling the digital still camera.

Remarks

Applicants appreciate the Examiner's review of the application and the comments in the Office Action dated January 21, 1999. In summary, the Office Action indicates that the specification was objected to as failing to provide an enabling disclosure insofar as claim terms "internal camera" and "using the videocommunicator ... without controlling the digital still camera"; the drawings were objected to for failing to illustrate the claim terms "internal camera" and "external camera"; claims 1-13 were rejected as being anticipated by one of two prior art references; and claim 14 was rejected as being obvious in view of the prior art.

Regarding the enablement objection for the claim terms "internal camera" (claim 12) and "using the videocommunicator ... without controlling the digital still camera" (claim 14), the Office Action indicates that there is no mention of an "internal camera" in the specification and that there is discussion in the specification of how to accomplish "using the videocommunicator

... without controlling the digital still camera.” Applicant submits that the discussion of the ViaTV products available from 8x8, Inc. and reference to the appendix at page 9 of the specification is sufficient to provide the support; nonetheless, Applicant has amended claim 12 to cancel the term “internal camera.” Applicant relies upon the discussion in the disclosure at page 7 of the specification for support of “using the videocommunicator ... without controlling the digital still camera”. At page 7 of the specification, an example implementation is discussed wherein a telephone keypad is used to provide the control for effecting electronic (versus mechanical) manipulation of the display, as discussed at length in the patent document No. 08/861,619. Applicant submits that this discussion is sufficient to provide enabling support; if additional discussion in the specification is believed to be warranted, however, Applicant would be amenable to amending the specification.

As for the drawings objection, with the cancellation of the claim term “internal camera”, the only issue remaining in this regard is “external camera”. Applicant relies upon the item 16 of FIG. 1 and the item 66 of FIG. 2 as support for the “external camera.” Paragraph 3 of the Office Action is not clear. Please indicate if additional copies of the two pages of informal drawings are needed.

Each of the claim rejections relies upon JP149333 (Kamihara), which was published June 6, 1997 (as shown in the translated copy provided with the Office Action) or the ‘185 patent. Through the above amendments and remarks set forth below, Applicant submits that the presently claimed invention is distinguishable from the cited references and/or antedates the cited references. The above amendment to page 1 of the instant specification provides a priority date of 1992 for subject matter claimed.

Using the filing date (February 19, 1992) of U.S. Patent No. 5,379,351 as a priority date, neither reference bears a date that constitutes prior art. Evidence for this contention is set forth below using representative claim 1 to illustrate the correspondence between the presently-claimed invention (*e.g.*, as claimed in claims 1, 2, 4, 6, 7 and 12) and the disclosure of U.S. Patent No. 5,379,351.¹

Claim 1	Example teaching in Patent No. 5,379,351
A method of videoconferencing comprising the steps of :	One example discussed is a system including a "picture phone" device as referenced at column 4, line 14.
providing a videocommunicator having a video signal input port, a video signal encoding circuit and a video signal output port; and	The system includes a vision controller 12 of FIG. 1 for video signal encoding, with a video signal input port and a video signal output port, both at 7 of FIG. 1 (Col. 4, lines 30-33).
using a digital still camera to generate video input signals to the video input port of the videocommunicator, the video output port of the videocommunicator capable of communicatively coupling to a communications channel for providing videoconferencing.	I/O device 8 of FIG. 1 implements a frame grabber that provides video data to the port 7 of FIG. 1 (Col. 4, lines 30-33, 52-56, Col. 5, lines 4-10). A telephone transceiver implemented via I/O device 8 of FIG. 1 is used to communicatively couple to a communications channel for providing videoconferencing (Col. 4, lines 30-33).

Claims 1-5, 7-13 have been rejected under 35 U.S.C. 102(e) as being anticipated by Kamihara. The rejection of claims 1, 7 and 12 should be overcome with in view of the support demonstrated in the '351 patent. The priority date of the '351 patent is also believed to expressly support claims 2 and 7 (videocommunicator with a DSP circuit and a general

¹ The declaration filed for the '351 patent is analogous to an affidavit or declaration under 37 C.F.R. 1.131. The correspondence illustrated in the table is believed to more than adequately support the claimed priority date of February 19, 1992. Applicants note the analogous discussion of the MPEP, Sections 715.02 and 715.03, citing various authoritative decisions to explain that the priority entitlement issue turns on whether the inventor had "possession of the invention (*i.e.*,

purpose processor circuit) as evidenced by vision processor of FIGs. 1 and 2 of the '351 patent showing a RISC (*e.g.*, 102 of FIG. 4) and a DSP (*e.g.*, 92 and 94 of FIG. 4B) with (de)compression programs; and claim 4 (another output port for display) as evidenced by item 18 of FIG. 1 of the '351 patent.

Further each of claims 2-5, 8-11, and 13-14 should be distinguishable from the asserted reference in view of the amendments made thereto. For example, none of the asserted references discusses use of a DSP and general purpose process to process video signals as characterized by the claimed invention.

The rejection of claim 6 should also be overcome because the claimed priority date of the '351 patent antedates the asserted '185 patent reference.

The rejection of claim 14 should also be overcome because the priority date of the '351 patent antedates the asserted Kamihara reference.

Applicant submits that the objections have been overcome, that the rejection of the pending claims supported by the '351 patent disclosure should be withdrawn consistent with the analogous sections of MPEP 715.02 and 715.03, and that the limitations discussed above overcome any remaining bases for the rejections.

Accordingly, Applicant respectfully submit that the above amendment and remarks are believed to place the above-referenced application in condition for allowance. Should the

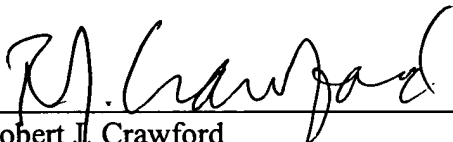
the basic inventive concept),” and, assuming any differences would have been obvious, the “differences between the claimed invention and the showing” are unimportant.

Examiner have any questions, the undersigned can be contacted by telephone as indicated below.

Respectfully submitted,

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